



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Huron County Landfill
Ground Water
Huron County, Ohio

May 19, 2009

Huron County Commissioners
180 Milan Avenue
Norwalk, Ohio 44857

Dear Commissioners:

The Ohio Environmental Protection Agency (Ohio EPA) reviewed the *"Response (dated September 23, 2008) to Ohio EPA letter of August 21, 2008, regarding comments on the Spring 2008 Ground Water Monitoring Report."* Ohio EPA received the document on September 24, 2008. The Huron County Commissioners (owner/operator) are required to monitor ground water quality at the Huron County Landfill (facility) in accordance with Ohio Administrative Code (OAC) Rule 3745-27-10, effective August 15, 2003. Wells MW-19, AW-19A and MW-19C are in assessment monitoring due to statistically significant concentrations of sodium, chloride, and Volatile Organic Compounds (VOCs). Ohio EPA reviewed the subject document with respect to Ohio EPA's November 21, 2008, letter and the requirements of Ohio Administrative Code (OAC) Rule 3745-27-10.

COMMENTS

Evaluation of Owner or Operator's Response to Previously Cited Violations

1. **The owner/operator remains in violation with OAC Rule 3745-27-10(C)(10)(g), which requires the sampling event report include the practical quantitation limits (PQLs) for the constituents analyzed. For the owner/operator to return to compliance, the laboratory (Test America) should identify the PQLs used in the analytical reports, beginning with the analytical report dated May 14, 2008, for the Spring 2008 sampling event.**

The owner/operator response states, *"The owner/operator is not in violation of OAC Rule 3745-27-10(C)(10)(g), as this information is included in the lab reports. It is listed under the heading of 'Rpt Limit', which is adjacent to the 'MDL' column"* (September 23, 2008 letter, p. 1).

More Information Needed to Determine Compliance

- 2. Compliance with OAC Rule 3745-27-10(C)(7)(e), which requires the PQL, used in the statistical method, be the lowest concentration level that can be reliably achieved within the specified limits of precision and accuracy, cannot be determined at this time. To determine compliance, Test America should identify the PQLs used in the analytical reports, beginning with the analytical report dated May 14, 2008, for the Spring 2008 sampling event.**

The owner/operator's response to Ohio EPA's August 21, 2008, letter Comment 2 is inadequate. Ohio EPA requested that Test America submit the PQLs that were used to analyze the Spring 2008 ground water samples from Huron County Landfill. The owner/operator did not provide this information in their response.

The owner/operator response states, *"The PQLs used by Test America were included in the laboratory reports in the column labeled 'Rpt Limits'"* (September 23, 2008 letter, p. 2).

- 3. Compliance with OAC Rule 3745-27-10(C)(1), which requires consistent sampling, analysis, and statistical methods, designed to ensure monitoring results that provide an accurate representation of ground water quality at the background and downgradient wells, cannot be determined at this time. To determine compliance, Test America should discuss how results are affected when ground water samples are received at temperatures above 6 °C. In addition, the owner/operator should identify and Test America should verify the ground water samples that were shipped to the laboratory in coolers 1 through 8 on May 1, 2008.**

The owner/operator's response to Ohio EPA's August 21, 2008, Comment 3 is inadequate. Ohio EPA requested that Test America verify how the high temperature of the samples affected the sample results and requested the owner/operator to identify the affected samples. The owner/operator did not provide this information in their response.

The owner/operator response states, *"The volatiles and some wet chemistry tests may have been impacted by elevated temperatures, which may have resulted in lower results than would be expected. It should be noted that none of the VOC sample vials were noted as having bubbles or headspace during the bottle check in, so lower VOC concentrations are unlikely"* (September 23, 2008 letter, p. 3).

Statements

4. The owner/operator's response to Comment 4 in the August 21, 2008, letter is inadequate. Ohio EPA is addressing this issue in a separate correspondence to the owner/operator. The owner/operator should see Ohio EPA's letter, regarding the owner/operator's "Response (dated September 23, 2008) to Ohio EPA letter of August 21, 2008, regarding comments on the Ground Water Quality Assessment Plan" for more information.
5. The owner/operator's response to Comment 5 in the August 21, 2008, letter is adequate. No additional information is needed to address this comment.

If you have any questions please feel free to contact Pete Sokoloski at the Ohio EPA Northwest District Office (419-373-4100). Any written correspondence should be sent to the attention of Tyler Madeker, Division of Solid and Infectious Waste Management, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Tyler Madeker S.I.T.
Division of Solid and Infectious Waste Management

/csi

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